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BEFORE THE ARIZONA CORPORATION COMMISSION

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MARC SPITZER
Chairman
WILIAM A. MUNDELL
Commissioner
JEFF HATCH-MILLER
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner

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Arizona Corporation Commission

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AZ CORP COMMISSION
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IN THE MATTER OF QWEST CORPORATION'S
FILING OF RENEWED PRICE REGULATION
PLAN

Docket No. T-01051B-03-0454

IN THE MATTER OF THE INVESTIGATION OF
THE COST OF TELECOMMUNICATIONS
ACCESS

Docket No. T-00000D-00-0672

STAFF'S REPLY TO AT&T MOTION FOR PROTECTIVE ORDER

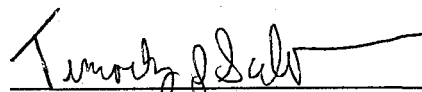
Staff hereby responds to the Motion for a Protective Order filed by AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively, "AT&T"). Staff believes that a protective order may be appropriate in this case. There are a large number of parties in this case, many of whom are conducting discovery. This has resulted in Staff entering into numerous protective agreements with other parties. It would be burdensome to require every party to enter into protective agreements with every other party. Having one protective order that is applicable to all parties will result a standardized, smoother process for exchanging confidential data. Accordingly, Staff generally supports AT&T's motion.

Staff fully supports the issues and proposed language raised by RUCO in its response to AT&T's motion. RUCO's proposed language appropriately requires that the burden of demonstrating that material is entitled to confidential (or highly confidential) treatment remains on the party requesting confidential (or highly confidential) treatment.

...

1 Staff also requests one further modification to AT&T's proposed order. The proposed order
2 limits the number of in-house experts allowed to view highly confidential information to five. Staff
3 requests that the number of in-house experts allowed to review highly confidential information be
4 increased to six, at least as it applies to Staff. AT&T's proposed limit of five makes sense when
5 applied to competitors, because one competitor is naturally reluctant to share highly confidential
6 information with the in-house personnel of its competitors. However, these concerns do not apply
7 with the same force to Staff. Further, because of Staff's heavy workload, Staff has had to involve
8 numerous persons in reviewing data and preparing testimony in this case. Accordingly, Staff requests
9 that it be allowed six in-house experts to view highly confidential data.

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11 RESPECTFULLY SUBMITTED this 17th day of August, 2004.

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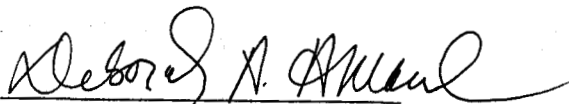
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